

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY M. TARDIF,

Plaintiff,

NOTICE OF MOTIONS *IN LIMINE*

-against-

13 Civ. 4056 (KMW)(KNF)

CITY OF NEW YORK, SERGEANT THOMAS MCMANUS,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITY,
Defendants-Appellees, NEW YORK CITY POLICE
DEPARTMENT, DEPUTY COMMISSIONER JOHN
O'CONNELL, DEPUTY INSPECTOR DANIEL MULLIGAN,
DEPUTY INSPECTOR EDWARD WINSKI, POLICE
OFFICER JAMES MCNAMARA, POLICE OFFICER ALENA
AMINOVA, POLICE OFFICER KENDAL CREER, POLICE
OFFICER MARSHA RUMBLE, POLICE OFFICER FELIX
SCHMIDT, JOHN DOE, NYPD OFFICERS #1-13, JOHN DOE,
NYPD OFFICERS #1-11, JOHN DOE, NYPD OFFICERS #1-9,
JOHN DOE, NYPD OFFICER #11,

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of Joshua J. Lax, Esq., dated February 28, 2022, and the exhibits annexed thereto, the Memorandum of Law dated February 28, 2022, and upon all prior pleadings and proceedings had herein, defendant City of New York, will move this Court before the Honorable Kimba M. Wood, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, in advance of trial for an Order pursuant to the Federal Rules of Evidence to exclude certain evidence at trial, and for further rulings regarding the admissibility of certain evidence, and relief as this Court may deem just, proper, and equitable.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court Order dated February 8, 2022, plaintiff's opposition is due by March 21, 2022, and defendants' reply, if any, is due by March 28, 2022.

Dated: New York, New York
February 28, 2022

HON. SYLVIA O. HINDS-RADIX
CORPORATION COUNSEL OF THE CITY OF NEW YORK
Attorney for Defendant
100 Church Street
New York, New York 10007
(212) 356-3538

By: /s/
JOSHUA J. LAX
Senior Counsel
Special Federal Litigation Division

cc: All counsel of record (by ECF only)

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MARY M. TARDIF,

Plaintiff,

-against-

CITY OF NEW YORK, SERGEANT THOMAS MCMANUS, IN
HIS INDIVIDUAL AND OFFICIAL CAPACITY, Defendants-
Appellees, NEW YORK CITY POLICE DEPARTMENT, DEPUTY
COMMISSIONER JOHN O'CONNELL, DEPUTY INSPECTOR
DANIEL MULLIGAN, DEPUTY INSPECTOR EDWARD WINSKI,
POLICE OFFICER JAMES MCNAMARA, POLICE OFFICER
ALENA AMINOVA, POLICE OFFICER KENDAL CREER,
POLICE OFFICER MARSHA RUMBLE, POLICE OFFICER FELIX
SCHMIDT, JOHN DOE, NYPD OFFICERS #1-13, JOHN DOE,
NYPD OFFICERS #1-11, JOHN DOE, NYPD OFFICERS #1-9,
JOHN DOE, NYPD OFFICER #11,

Defendants.

NOTICE OF MOTIONS *IN LIMINE*

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
Attorney for Defendant
100 Church Street
New York, New York 10007

Of Counsel: Joshua J. Lax
Tel: (212) 356-3538

Due and timely service is hereby admitted.

New York, New York....., 2022 . . .

..... *Esq.*

Attorney for